

Pro Se 7 2016

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

MIICHAEL E LONG

CASE NO. 2:23-cv-00209-RSL  
[to be filled in by Clerk's Office]

COMPLAINT FOR EMPLOYMENT  
DISCRIMINATION

Plaintiff(s),

Jury Trial: ☐ Yes ☐ No

v.

Amazon.com Services LLC

Defendant(s).

**I. THE PARTIES TO THIS COMPLAINT**

**A. Plaintiff(s)**

*Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.*

Name	Michael E Long
Street Address	PO BOX 15976
City and County	St Petersburg. Pinellas County
State and Zip Code	Florida 33733
Telephone Number	7277540737

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## 1 B. Defendant(s)

2 *Provide the information below for each defendant named in the complaint, whether the*  
 3 *defendant is an individual, a government agency, an organization, or a corporation. For an*  
 4 *individual defendant, include the person's job or title (if known). Attach additional pages if*  
 5 *needed.*

## 6 Defendant No. 1

7 Name AMAZON.COM SERVICES

8 Job or Title (if known) \_\_\_\_\_

9 Street Address 410 TERRY AVE N10 City and County SEATTLE KING11 State and Zip Code WASHINGTON 98109

12 Telephone Number \_\_\_\_\_

## 13 Defendant No. 2

14 Name \_\_\_\_\_

15 Job or Title (if known) \_\_\_\_\_

16 Street Address \_\_\_\_\_

17 City and County \_\_\_\_\_

18 State and Zip Code \_\_\_\_\_

19 Telephone Number \_\_\_\_\_

## 20 Defendant No. 3

21 Name \_\_\_\_\_

22 Job or Title (if known) \_\_\_\_\_

23 Street Address \_\_\_\_\_

24 City and County \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

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Defendant No. 4 PLACE OF EMPLOYMENT #7

Name DWX3

Job or Title (if known)

Street Address 6050 E MARGINAL WAY S

City and County SEATTLE KING COUNTY

State and Zip Code WA 98108

Telephone Number

## C. Place of Employment #2

The address at which I sought employment or was employed by the defendant(s) is:

Name DWA2

Street Address 2871 S 102ND ST

City and County TUKWILLA KING COUNTY

State and Zip Code WA 98168

Telephone Number

## II. BASIS FOR JURISDICTION

This action is brought for discrimination in employment pursuant to (check all that apply):



Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)

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## 3. The Amount in Controversy.

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because *(explain)*  
*Attach additional pages if needed:*

350,000 in lost wages and denied career advancement

**III. STATEMENT OF CLAIM**

*Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.*

Between May 2020 and FEB 2022, Amazon stations DWX3 and DWA2 engage in unlawful racial discrimination and harrashment against Plaintiff because he is an natural born African American male, by denying him promotions, forcing him to work in a hostile enivronment where he was subject to death threats, racial taunts and racial harrashment by mangement and security oficals, and after a good faith complaint about the racial harasshment and discrimination was retaliated against by subjecting him to stricter scrutiny than his coworkers and unwarranted negative performace feedback and unsubtain allegations of improper conduct, unwarranted suspensions and denied career advancement

**IV. RELIEF**

*State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. Attach additional pages if needed.*

ACTUAL DAMAGES, INCLUDING APPOROPRIATE AMOUNTS BACK PAY AND FRONT PAY AND MONEY LOST FROM FAILURE TO PROMOTE PLUS PENALTIES  
 AWARD COMPENSATORY IN THE AMOUNT BETWEEN 3% TO 10 % OF COMPANY TOTAL PROFITS IN IN THE YEARS 2020, 2021 AND 2022 FOR RACE DISCRIMINATION,  
 REALITATIONS,AND HOSTILE WORKING CONDITIONS  
 AWARD ALL COURT COSTS AND COURT EXPENSES,  
 GRANT ANY AND ALL ADDITIONAL RELIEF, WHICH THE COURTS DEEMS NECESSARY

**V. CERTIFICATION AND CLOSING**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper

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purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

02/14/2023

Signature of Plaintiff

Michael E Long

Printed Name of Plaintiff

MICHAEL E LONG

Date of signing:

Signature of Plaintiff

Printed Name of Plaintiff

Date of signing:

Signature of Plaintiff

Printed Name of Plaintiff

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**IV. EXHAUSTION OF FEDERAL ADMINISTRATIVE REMEDIES**

A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

5-28-2021

B. The Equal Employment Opportunity Commission *(check one)*:

☐ has not issued a Notice of Right to Sue letter.

☒ issued a Notice of Right to Sue letter, which I received on *(date)*

10 / 28 / 2022

*(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)*

C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct *(check one)*:

☐ 60 days or more have elapsed.

☐ less than 60 days have elapsed.

**V. RELIEF**

*State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.*

**Chris Rodriguez**

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**From:** Genie <genietransportation@yahoo.com>  
**Sent:** Wednesday, February 15, 2023 1:36 PM  
**To:** WAWDdb\_NewCasesSea  
**Subject:** Michael Long vs Amazon.com Service LLC

**Categories:** Chris

**2:23-cv-00209-RSL**

**CAUTION - EXTERNAL:**

# Michael Long vs

# Amazon.com

# Service LLC

## Statement of Facts

Promoted over 50 associates to the position of Ambassador during the time period of May 2020 - February 2022, Who had less experience then Plaintiff

Ask Plaintiff to walk around warehouse holding a big yellow banana, when told that that was racist, had another black associate carried it

For Black history month they serve bananas and watermelon

Was told by 2 different managers at 2 different locations that Plaintiff should apply for promotion because he "spoke so well

Was accosted by Security to prove Plaintiff work there even tho Plaintiff was in actual uniform and with ID badge showing and was inside the facility actually working

Plaintiff was also accosted and threatened by another associate who left her work station to come over to Plaintiff and make racist comments and threaten to "kill him" . The associate was not disciplined and continued to work in same vicinity as Plaintiff even tho the whole incident was on camera and there was witnesses

Plaintiff was assaulted in front of a manager by a white associate who threw a loaded box at Plaintiff, Manager claim to not have seen it , tho he was standing beside the associate at the time of the incident and there was 3 witnesses, another Manager (black female) had to intervene and had the associate move to another area but the associate was not disciplined and continued to work there

Was pass over for positions ranging from Transportation Associate, Production Assistant, Area Manager, Yard Marshals by less qualified associates and there were also additional incidents

Michael Long  
(Mailing Address )  
POBOX 15976  
St Petersburg FL 33733

Sent from my iPhone

**CAUTION - EXTERNAL EMAIL:** This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.